



**UNITED STATES ENVIRONMENTAL PROTECTION  
AGENCY  
REGION IX  
75 Hawthorne Street  
San Francisco, CA 94105**



**ARIZONA DEPARTMENT OF ENVIRONMENTAL QUALITY  
1110 West Washington  
Street Phoenix, Arizona  
85007**

Dr. Stephen TerMaath  
AFCEC/CIB  
2261 Hughes Avenue, Suite 155  
JBSA Lackland, TX 78236-9853

**SUBJECT:** Resolution of Formal Dispute over Draft Final Proposed Plan for SS017 (Old Pesticide/Paint Shop), Operable Unit 6, at Former Williams Air Force Base

Dear Dr. TerMaath:

In a letter to you dated February 20, 2015, the US Environmental Protection Agency (EPA) and Arizona Department of Environmental Quality (ADEQ) (collectively, the Regulatory Agencies) invoked formal dispute (Dispute) under Section 12.2 of the Williams Air Force Base Federal Facility Agreement (FFA) regarding the Revised Draft Final Amended Proposed Plan for the OU6 SS017 Old Pesticide Paint Shop (Site).

After a productive series of discussions pursuant to Sections 12.4 and 12.5 of the FFA, the Regulatory Agencies received and reviewed the letter from you dated January 25, 2017, by which the Air Force is proposing to resolve the Dispute. The proposed terms of the resolution are as follows:

- AF will implement the preferred alternative from the Final Operable Unit Proposed Plan from 2011, and the remedy will be consistent with the draft OU6 ROD prepared in March of 2012.
- AF will continue groundwater monitoring, implement land use controls on contaminated soil, and conduct five year reviews until residual contamination allows for unlimited use and unrestricted exposure.
- AF will conduct cleanup of lead contaminated soils at the site under the Arizona Voluntary Remediation Program. [ [HYPERLINK "http://www.azdeq.gov/VRP"](http://www.azdeq.gov/VRP) ] by completing the VRP Application [ [HYPERLINK "http://static.azdeq.gov/forms/vrp\\_app.pdf"](http://static.azdeq.gov/forms/vrp_app.pdf) ] and entering the program to get a No Further Action (NFA) completion letter.

Based on the information and terms presented in your January 25, 2017 letter and restated above, the Regulatory Agencies accept the Air Force's settlement proposal, and now consider this Dispute to be resolved. Consistent with Section 12.5 of the FFA, this letter constitutes the written decision to resolve the dispute unanimously, and all three of our signatures to this letter agreement, below, memorialize the resolution and final determination of the Dispute. Once you have signed the concurrence block, below, please return a fully executed copy of this letter to

the Regulatory Agencies and enter it into the administrative record for the Dispute.

The Regulatory Agencies look forward working with the Air Force to incorporate the resolution and final determination into the Proposed Plan for SS017, pursuant to Section 12.11 of the FFA. We are pleased to be able to move forward with this remedy and look forward to continuing to work with you.

Sincerely,

Enrique Manzanilla  
Director, Superfund Division  
US Environmental Protection Agency

Laura Malone  
Director, Waste Program Division  
Arizona Department of Environmental Quality

Concurrence on behalf of the United States Air Force:

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Dr. Stephen TerMaath  
Chief, BRAC Program Management Division  
Installations Directorate